

Annual 47 C.F.R. § 64.2009(e) CPNI Certification

EB Docket No. 06-36

Annual 64.2009(e) CPNI Certification for 2010

Names of Companies covered by this certification:

Broadvox LLC (Form 499 Filer ID 826005)
InfoTelis Corporation (Form 499 Filer ID 826004)
BroadvoxGo!, LLC (Form 499 Filer ID 827091)
Brivia Acquisition, LLC (Form 499 Filer ID 828028)
Origination Technologies, LLC (Form 499 Filer ID 827641)

Name of Signatory: Pete Sandev

Title of Signatory: Vice President, Broadvox LLC;
President, InfoTelis Corporation
Vice President, BroadvoxGo!
Vice President, Brivia Acquisition, LLC
Vice President, Origination Technologies, LLC

Date: February 24, 2010

I, Pete Sandev, certify that I am an officer of Broadvox LLC, InfoTelis Corporation, BroadvoxGo!, LLC; Brivia Acquisition, LLC; and Origination Technologies, LLC and acting as an agent on behalf of each company, that I have personal knowledge that each company has operating procedures and policies in place that are designed to ensure compliance with the Federal Communication Commission's ("Commission") CPNI rules. *See 47 C.F.R. § 64.2001 et seq.*

Attached to this certification is an accompanying statement explaining how each company's procedures are designed to maintain compliance with the Commission's CPNI rules. The attached statement applies to all five companies.

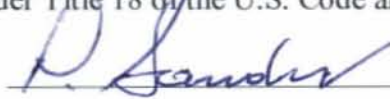
The companies did not take any actions (proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission) against data brokers during the 2009 calendar year. None of the companies received any complaints during 2009 concerning the unauthorized release of CPNI.

Each company has taken measures to protect against attempts to gain unauthorized access to CPNI. The companies have not discovered any information about the processes that pretexters are using to attempt to gain access to CPNI other than the information that already is contained publicly in this docket. As mentioned in Attachment A, the companies have implemented CPNI safeguards, including, without limitation, maintaining customer verification processes, and applying role-based authorization (limiting employees with access to data on a

need-to-know basis).

Each company represents and warrants that the above certification is consistent with 47 C.F.R. § 1.17 which requires truthful and accurate statements to the Commission. Each company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may be subject to enforcement action.

Signature:

A handwritten signature in blue ink, appearing to read "R. Gander", is written over a horizontal line.

February 24, 2010

ATTACHMENT A

BROADVOX LLC, INFOTELIS CORPORATION, BROADVOXGO!, LLC, BRIVIA ACQUISITION, LLC AND ORIGINATION TECHNOLOGIES, LLC

STATEMENT OF CPNI OPERATING PROCEDURES

Broadvox LLC, InfoTelis Corporation, and BroadvoxGo!, LLC, Brivia Acquisition, LLC and Origination Technologies, LLC provide various interconnected Voice over Internet Protocol ("VoIP") services. This statement of CPNI Operating Procedures applies to each of the five companies, which collectively are referred to herein as "Broadvox."

Broadvox has established policies and procedures that are designed to ensure that it is in compliance with the Federal Communications Commission's ("Commission") rules regarding the use, disclosure, and access to CPNI. Broadvox provides this statement pursuant to Section 64.0009(e) of the Commission rules, 47 C.F.R. § 64.0009(e), to summarize those procedures and policies. As part of these processes and procedures, Broadvox has appointed a compliance officer, responsible for overseeing the company's compliance with the FCC's CPNI rules.

PERMISSIBLE USES OF CPNI

Broadvox is committed to protecting its customers' privacy, and it limits its employees access to and use of CPNI. Broadvox may use CPNI for the following purposes: (1) to initiate, provide, and bill and collect for the communications services from which such information is derived; (2) to provide the services necessary to, or used in, the provision of the VoIP services that Broadvox provides, including in the publishing of directories; (3) to market services to our customers within the category of service to which the customer subscribes; and (4) to protect our rights and property, or to protect our customers and other carriers from fraudulent, abusive, or unlawful use of, or subscription to, our services. We also may use CPNI to provide any inbound telemarketing, referral, or administrative services to the customer for the duration of the call, if the customer initiated the call and approves of the use of such information to provide services.

Broadvox has implemented protections to protect against unauthorized disclosure or access to CPNI in the limited instances where it is required to share or disclose CPNI with third parties, such as for billing and collection.

USE OF CPNI FOR MARKETING PURPOSES

Broadvox does not use CPNI to market products and services to customers. Therefore, it is not subject to the customer notice requirements. If Broadvox subsequently seeks to use CPNI to market products and services for such purposes, then it will provide advance customer notification and seek appropriate approval from its customers before doing so. Broadvox does not share CPNI with joint venture partners or independent contractors for marketing purposes.

EMPLOYEE TRAINING/DISCIPLINARY PROCESS

Broadvox trains its personnel as to what information is classified as CPNI and as to when they are and are not authorized to use CPNI. Broadvox has an express disciplinary process for the misuse of CPNI, which includes the potential for termination.

SAFEGUARDS

Employees must follow specific procedures to authenticate its customers. Broadvox authenticates all in-coming calls. Broadvox also has implemented password protection for online account access. All online accounts are password protected, and Broadvox establishes those passwords without the use of readily available biographical information or account information. Broadvox also has implemented procedures to address lost or stolen passwords (such as challenge questions) that do not rely on the use of readily available biographical or account information. Broadvox does not have any retail locations.

All Broadvox employees are prohibited from disclosing call detail information during an in-bound call. Employees only are permitted to disclose call detail information to the email address of record. Broadvox has procedures in place to ensure that the email address has been in place for at least thirty days. Broadvox also limits internal disclosure of CPNI to those employees with a need-to-know.

Broadvox has implemented network security measures, including, but not limited to, the use of encryption. Under Broadvox's compliance program, employees are required to ensure that customer data is protected from pretexting and other unauthorized access. Broadvox employees are required to notify the Compliance Officer of any suspected attempts to gain access to a customer's CPNI whether through pretexting or otherwise.

Broadvox has implemented procedures for notifying customers of certain account changes, including, changes in online passwords, changes to online accounts, changes to a back-up means of authentication, and changes to the address of record.

Broadvox has procedures in place for responding to requests for information from law enforcement personnel or from any person other than the customer.

DATA SECURITY BREACHES

Broadvox will notify the United States Secret Service and the Federal Bureau of Investigation through the FCC's specifically designated portal (www.fcc.gov/eb/cpni) within seven days of the reasonable discovery of a data breach. In accordance with the FCC's rules, Broadvox will notify affected customers of the breach, unless requested to withhold disclosure by the USSS or the FBI. Broadvox's Compliance Officer will maintain a record in accordance with section 64.2011(d) of any breaches discovered, notifications made to law enforcement, and notifications made to customers for at least two years.

CUSTOMER COMPLAINTS

Broadvox tracks customer complaints it receives concerning the unauthorized use, disclosure, or access to CPNI. If we receive complaints regarding CPNI, we will break them down by category, and provide a summary of the complaints in the annual certification that we provide to the Commission.

NOTIFICATION OF ACCOUNT CHANGES

Broadvox notifies its customers immediately, via email, of certain account changes including any changes in the customer's online password, a change in the customer's address of record, a change in the customer's online account, and a change of the back-up means of authentication for lost or stolen passwords.